

Exhibit 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY

3 *****

MDL No. 2875

4 IN RE: VALSARTAN, LOSARTAN,
 AND IRBESARTAN PRODUCTS HON ROBERT B.
5 LIABILITY LITIGATION KUGLER

6 *****

7 THIS DOCUMENT APPLIES TO ALL
8 CASES

8

9 - CONFIDENTIAL INFORMATION -
 SUBJECT TO PROTECTIVE ORDER

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11 Remote Videotaped via Zoom
12 Deposition of HAI WANG, commencing at 9:03
13 a.m., on the 10th of March, 2021, before
14 Maureen O'Connor Pollard, Registered
15 Diplomate Reporter, Realtime Systems
16 Administrator, Certified Shorthand Reporter.

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1 Q. The third bullet point says,
2 "June 18, 2018: Princeton, as the drug product
3 application holder of Valsartan Tablets and
4 Valsartan-HCTZ Tablets, submitted a
5 face-to-face or teleconference meeting
6 request to FDA via e-mail communications and
7 eCTD submission."

8 That's what's indicated, right?

9 A. That's correct.

10 Q. When between June 9, 2018 and
11 June 18, 2018 was Princeton notified by ZHP of
12 this NDMA issue?

13 A. Yeah, Princeton was notified, I
14 think, right around the June 19 time frame.
15 That's when I received the notification from
16 Jun Du, and we decided to stop the
17 distribution product immediately.

18 Q. Did you say June 19?

19 A. Either June 18 or June 19,
20 yeah.

21 Q. Do you agree with me that you
22 needed to notify the FDA immediately after
23 learning of this issue?

24 MR. GOLDBERG: Objection to the

1 form.

2 A. This is regulatory's call.

3 Once they've been notified, yes, immediately
4 notify the FDA.

5 BY MR. SLATER:

6 Q. This indicates in the fourth
7 bullet point, "June 19, 2018: The
8 manufacturer stopped release of all Valsartan
9 drug substance and issued a notice to all
10 customers, including Princeton, informing them
11 to put on hold Valsartan drug substance
12 pending further notice from Huahai."

13 That's again something that you
14 told the FDA based on what ZHP told you,
15 correct?

16 MR. GOLDBERG: Objection to
17 form.

18 A. That's correct.

19 BY MR. SLATER:

20 Q. Do you know why it is that ZHP
21 waited between June 9 when they confirmed the
22 NDMA was in the valsartan and waited till
23 June 19th to send out this notification?

24 MR. GOLDBERG: Objection to the